

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

<b>VOTER REFERENCE FOUNDATION, LLC</b>	)	
	)	<b>CASE NO: 1:22-cv-00222-JB-KK</b>
	)	
Plaintiffs,	)	
<b>v.</b>	)	
	)	
	)	
<b>HECTOR BALDERAS</b> , in his official	)	<b>PLAINTIFF’S UNOPPOSED MOTION</b>
capacity as New Mexico Attorney General, and	)	<b>TO EXTEND THE TERMINATION</b>
<b>MAGGIE TOULOUSE OLIVER</b> , in her	)	<b>DATE FOR DISCOVERY</b>
Official capacity as New Mexico	)	
Secretary of State,	)	
	)	
Defendants.	)	

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND THE TERMINATION DATE FOR  
DISCOVERY**

Appellee, Voter Reference Foundation (“VRF”), by its undersigned counsel, respectfully moves the Court, pursuant to this Court’s inherent authority, for an order extending the termination date for discovery seventeen (17) days to March 3, 2023, and in support states:

1. Currently, the termination date for discovery is February 14, 2023.
2. VRF’s counsel has conferred with counsel for the State. The State does not oppose VRF’s motion.
3. One of VRF’s counsel in this case recently took paternity leave and another is also preparing to take paternity leave at any moment, which has and will continue to affect counsels’ ability to engage in discovery.
4. For this reason, VRF moves this Court to extend the termination date of discovery to March 3, 2023.

5. This is VRF's first request to extend discovery. This request is not made to delay this matter.

For the foregoing reasons, VRF respectfully requests that this motion be granted.

Respectfully submitted this 30<sup>th</sup> day of December, 2022.

**GRAVES GARRETT, LLC**

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*Counsel for Plaintiff VRF*

**CERTIFICATE OF SERVICE**

I, Edward D. Greim, certify that on December 30, 2022, a copy of Plaintiff's Response to Defendants' Motion to Stay Preliminary Injunction Pending Appeal was filed with the Clerk of the Court using the CM/ECF system, which sent notification to the following via e-mail:

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Balderas and New Mexico Secretary of  
State Maggie Toulouse Oliver***

/s/ Edward D. Greim  
Edward D. Greim  
Counsel for Plaintiff